

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<hr/>	:	CHAPTER 13
	:	
DANIEL R. GEHMAN AND	:	
LYNA K. GEHMAN,	:	BANKRUPTCY NO. 18-11930
	:	
Debtors.	:	
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ORDER

AND NOW, upon consideration of the Motion of Debtors to Amend their 13 Plan Post-Confirmation, it is hereby

ORDERED, that the Motion is **GRANTED**; it is further

ORDERED, that the Fifth Amended Plan filed on 12/30/20 (doc. no. 72) is
CONFIRMED.

BY THE COURT:



Date: January 7, 2021

HONORABLE PATRICIA M. MAYER,
U.S. BANKRUPTCY JUDGE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	CHAPTER 13
	:	
DANIEL R. GEHMAN AND LYNA K. GEHMAN,	:	BANKRUPTCY NO. 18-11930
	:	
Debtors.	:	
	:	

MOTION OF DEBTORS TO AMEND PLAN POST-CONFIRMATION

AND NOW COMES DANIEL R. GEHMAN and LYNA K. GEHMAN (the “Debtor”), by and through their counsel, Alaine V. Grbach, Esquire, who hereby moves this Honorable Court for an Order amending their plan post confirmation (the “Motion”), and in support thereof, respectfully represents as follows:

1. The above-captioned Debtors' Chapter 13 Plan has was confirmed by this Honorable Court on September 12, 2019.
2. After Confirmation, Debtor Husband's employer closed due to covid.
3. Due to the 2020 covid shut-down, Debtor Husband's outlook for continued employment is unstable.
4. Debtors' Confirmed Plan provides for a substantial cure of pre-petition mortgage arrears.
5. Debtor Husband now wishes to withdraw sufficient funds from his 401k to pay his remaining plan balance in full.

6. Debtors now wish to amend their Plan, Post-Confirmation, under and pursuant to the terms set forth in their Fourth Amended Plan, which has been filed with this Honorable Court today.

7. Debtor Husband will have the 401k funds available by the end of 2020.

8. Debtors represent that the instant Motion is in the best interest of Debtor, this Estate, and his Creditors.

WHEREFORE, the Debtors respectfully request this Honorable Court enter an Order (i) Granting Debtors' Motion to Amend this Plan Post-,Confirmation, and (ii) granting such other and further relief as this Honorable Court deems just and proper.

Respectfully submitted,

ALAINE V. GRBACH, ESQ.

By: /s/ Alaine V. Grbach
ALAINE V. GRBACH, ESQ.
675 Estelle Drive
Lancaster, PA 17601
Counsel to the Debtor

Dated: 12/9/2020

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CERTIFICATE OF SERVICE

I, Alaine V. Grbach, Esquire, hereby certify that on the 29th day of December, 2020, I directed to be served a copy of the Motion of Debtor to Amend Plan Post-Confirmation, FOURTH Amended Plan, Notice of Hearing and Proposed Order either by e-notice or mailed via first class mail postage prepaid of to the Debtors and the following:

All e-notice parties

All creditors on the Attached [Service List](#)

The Office of the United States Trustee
Scott Waterman, Trustee
(via email)

ALAINE V. GRBACH, ESQ.

By: /s/ Alaine V. Grbach,
ALAINE V. GRBACH
Counsel to the Debtor

Dated: 12/9/2020